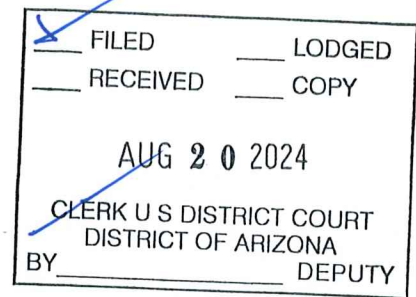


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REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Felipe Arturo Avalos-Mejia,
a.k.a. Raul Soto Mejia,
a.k.a. Pollo,
a.k.a. Felipe Arturo Avalos-Mexia,
a.k.a. Manuel Zamorano-Rameriz and,
a.k.a. Manuel Martinez,
Defendant.

No. CR-24-8090-PCT-DJH (ASB)

INDICTMENT

VIO: 18 U.S.C. §§ 659 and 2
(Possession or Receipt of Goods
Stolen from Interstate Shipment,
Aid and Abet)
Count 1

18 U.S.C. §§ 924(d) and 981;
21 U.S.C. § 853; and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

On about and between June 8, 2023, and June 21, 2024, in the District of Arizona and elsewhere, Defendant FELIPE ARTURO AVALOS-MEJIA knowingly aided and abetted known and unknown individuals in the possession of goods and chattels, to wit: Nike Shoes, of a value in excess of \$1000.00, which had been stolen from a BNSF train while moving in interstate commerce from California to Arizona, knowing the said goods and chattels to be stolen.

1 All in violation of Title 18, United State Code, Sections 659 and 2.

2 **FORFEITURE ALLEGATION**

3 The Grand Jury realleges and incorporates the allegations of Count 1 of this
4 Indictment, which are incorporated by reference as though fully set forth herein.

5 Pursuant to 18 U.S.C. §§ 924(d) and 981; 21 U.S.C. § 853; and, 28 U.S.C. § 2461(c),
6 and upon conviction of the offense alleged in Count 1 of this Indictment, Defendant shall
7 forfeit to the United States of America all right, title, and interest in (a) any property
8 constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as
9 the result of the offense, and (b) any of the Defendant's property used, or intended to be
10 used, in any manner or part, to commit, or to facilitate the commission of, such offense as
11 to which property the Defendant is liable.

12 If any forfeitable property, as a result of any act or omission of the Defendant:

13 (1) cannot be located upon the exercise of due diligence,

14 (2) has been transferred or sold to, or deposited with, a third party,

15 (3) has been placed beyond the jurisdiction of the court,

16 (4) has been substantially diminished in value, or

17 (5) has been commingled with other property which cannot be divided without
18 difficulty,

19 it is the intent of the United States to seek forfeiture of any other property of said
20 Defendant up to the value of the above-described forfeitable property, pursuant to 21
21 U.S.C. § 853(p).

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1 All in accordance with 18 U.S.C. §§ 924(d) and 981; 21 U.S.C. § 853; and, 28
2 U.S.C. § 2461(c); and Rule 32.2, Federal Rules of Criminal Procedure.

3
4 A TRUE BILL

5 S/
6 FOREPERSON OF THE GRAND JURY
Date: August 20, 2024

7 GARY M. RESTAINO
8 United States Attorney
District of Arizona

9
10 S/
11 ADDISON OWEN
TRAVIS L. WHEELER
Assistant U.S. Attorneys